

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:  
MARVIN .A BROOKS \* CHAPTER 13  
\* BANKRUPTCY NO. 19-15914  
\*  
Debtors

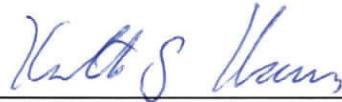
**DEBTORS' OBJECTION TO CERTIFICATE OF DEFAULT**

Debtor, Marvin A. Brooks, by and through his attorney, Kenneth G. Harrison, Esquire, respectfully represents the following:

1. Mortgage company, Flagstar Bank, filed a Certification of Default concerning a Stipulation.
2. Mortgage company claims that Debtor did not pay all of the mortgage statements.
3. Debtor objects to the Certification of Default on the following grounds:
  - A. Debtor has made payments during the time periods of alleged non-payment by the mortgage company. See Exhibit "A".
  - B. Debtor's attorney attempted to fax proof of payments to Mortgage company's attorney, as per the Notice of Default, but the fax machine was always busy.

WHEREFORE, Debtor respectfully requests that this Honorable Court dismiss this Certification of Default.

Respectfully submitted,

  
\_\_\_\_\_  
Kenneth G. Harrison, Esquire  
Five Neshaminy Interplex Suite 115  
Trevose, PA 19053



020  
CHESTNUT HILL (661)  
8340 GERMANTOWN AVENUE  
PHILADELPHIA, PA, 19118  
Cashbox 09

Business Date OCT 25, 2021  
Calendar Date OCT 25, 2021

Purchase 11:33  
Transaction Number 00164  
Account Type Official Check  
Account Number XXXXXXXX  
Document Number 4941947  
Transaction Amount \$ 3,426.00  
Funded by Check \$ 3,426.00

Payee:  
FLAGSTAR  
Remitter:  
MARVIN BROOKS

This deposit or payment is accepted subject to verification and to the rules and regulations of this bank. Deposits may not be available for immediate withdrawal. Receipt should be held until verified with your statement.

FOR MORE INFORMATION AND EXAMPLES OF WHEN  
DEPOSITS BECOME AVAILABLE, GO TO  
[WWW.PNC.COM/BANKWISELY](http://WWW.PNC.COM/BANKWISELY)



060  
FLEMINGTON (035)  
240 US HIGHWAY 202, 31 N  
FLEMINGTON, NJ, 08822  
Cashbox 07

Business Date AUG 27, 2021  
Calendar Date AUG 27, 2021

Purchase 12:50  
Transaction Number 00136  
Account Type Official Check  
Account Number XXXXXXXX  
Document Number 03870875  
Transaction Amount \$ 1,713.00  
Funded by Check \$ 1,713.00

Payee:  
FLAGSTAR BANK  
Remitter:  
MARVIN BROOKS

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060  
FLEMINGTON (035)  
240 US HIGHWAY 202 31 N  
FLEMINGTON, NJ, 08822  
Cashbox 02

Business Date APR 29, 2022  
Calendar Date APR 29, 2022

Purchase 16:55  
Transaction Number 00220  
Account Type Official Check  
Account Number XXXXXXXX  
Document Number 03925003  
Transaction Amount \$ 1,713.00  
Funded by Check \$ 1,713.00

Payee:  
FLAGSTAR BANK  
Remitter:



020  
1600 MARKET STREET (670)  
1600 MARKET STREET  
PHILADELPHIA, PA, 19103  
Cashbox 11

Date APR 18, 2022  
Date APR 18, 2022

Transaction Number	00142
Account Type	Official Check
Account Number	XXXXXXX
Document Number	5052852
Transaction Amount	\$ 1,713.00
Funded by Check	\$ 1,713.00

Payee:  
FLAGSTAR BANK  
Remitter:



060  
FLEMINGTON (035)  
240 ROUTE 202  
FLEMINGTON, NJ, 08822  
Cashbox 03

Business Date	JUN 4, 2021
Calendar Date	JUN 4, 2021
Purchase	16:55
Transaction Number	00086
Account Type	Official Check
Account Number	XXXXXXXXXX
Document Number	038*5160
Transaction Amount \$	1,713.00
Funded by Check \$	1,713.00

Payee:  
FLAG STAR BANK  
Remitter:  
MARVIN BROOKS

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060  
FLEMINGTON (035)  
240 ROUTE 202  
FLEMINGTON, NJ, 08822  
Cashbox 04

Business Date	JUN 25, 2021
Calendar Date	JUN 25, 2021
Purchase	16:54
Transaction Number	00266
Account Type	Official Check
Account Number	XXXXXXXXXX
Document Number	03825329
Transaction Amount \$	1,713.00
Funded by Check \$	1,723.00
Fee Amount \$	10.00

Payee:  
FLAG STAR BANK  
Remitter:  
MARVIN BROOKS

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UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: \* CHAPTER 13  
MARVIN A. BROOKS \* BANKRUPTCY NO. 19-15914  
\*  
Debtor \*

ORDER

AND NOW, this day of , 2022, upon  
consideration of Debtor's Objection to Certification of Default,  
it is hereby ORDERED and DECREED that;  
said Certification is DENIED

BY THE COURT:

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J.

Kenneth G. Harrison, Esquire  
Five Neshaminy Interplex Suite 115  
Trevose, PA 19053

KML Law Group, P.C.  
701 Market Street  
Suite 5000  
Philadelphia, Pa 19106

Kenneth E. West, Esquire (Trustee)  
1234 Market Street  
Suite 1813  
Philadelphia, PA 19107